

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSE MARIA DeCASTRO,
a/k/a CHILLE DeCASTRO,
a/k/a DELETE LAWZ,

Plaintiff,

v.

JOSHUA ABRAMS a/k/a
ACCOUNTABILITY FOR ALL, KATE
PETER a/k/a MASSHOLE
TROLL MAFIA,

Defendants.

CASE NO. 1:22-cv-11421-ADB

AFFIDAVIT OF TODD LYON

I, Todd Lyon, under oath depose and state as follows based upon my personal knowledge:

1. I am an adult resident of Denver, Colorado and am over 18 years of age.

I am submitting this affidavit to catalogue at least a portion of the abuse, harassment, intimidation and threats to which Jose Maria DeCastro ("Mr. DeCastro") has subjected me. As a result of Mr. DeCastro's behavior, I have a credible fear for my life and those of my family members. Although I have previously sought to keep my identity confidential, given Mr. DeCastro's conduct, and my understanding that he has disclosed my identity to many people, I have made the decision to submit this effort in the hopes that this Court might be able to help to ensure that Mr. DeCastro immediately ceases directing communication, abuse, harassment, and threats towards me.

2. As I apprised this Court by email on October 18, 2022, during the first half of October Mr. DeCastro sought to blackmail and extort me to produce documentation and evidence which he thought would support his case against Kate Peter (“Ms. Peter”). He told me that if I did not a) give him an affidavit with the content and form he wanted it in, and b) if I did not participate in a “documentary” he intends to create on the defendant, he would put my entire life and identity on-line to his nearly 50,000 subscribers the social media platform YouTube, and with his “partner” resources who have a reach of over 3M users on the social media platform TikTok

3. I am attaching here as Exhibit A a true and correct copy of text messages which reveal that Mr. DeCastro threatened to “doxx” me, to expose my identity and details about my entire life, to his subscribers, despite being provided full and adequate proof of who I am and how to be contacted.

4. Mr. DeCastro’s abuse, harassment, and threats towards me did not end there, however.

5. On the afternoon of Friday, October 21, 2022 beginning at 4:35 PM EST and into the night, Mr. DeCastro repeatedly texted me demanding that I “amend” documentation I was previously created under threat, and claiming I was forcing him to subpoena me: “[W]hy would you Force [sic] me to subpoena you?” He expressed that he was on the edge of losing control and taking direct action against me: “I think we should talk on the phone and work our differences out before I fucking snap[.]” A true and correct copy of some of the last two block of text messages are attached here as Exhibit B.

6. At 10:42 PM MT on Friday, October 21, 2022, the intercom of my building buzzed. I was already asleep and answered the third call. Although the person at the door

initially claimed they were delivering a package from Amazon, the person then called back and said they were an officer of the court there to serve papers. I asked what the person's name was. They did not answer. Through a security camera positioned at the far end of my building, I saw two people at the entrance to the building. Those two people then left.

7. At 1:30 AM MT on Saturday, October 22, 2022, my intercom went off again. I answered it. This time, I saw three people via my building's video camera. All three had hoodies over their faces. Again, they claimed that they were officers of the court to serve me. They called back three more times. The third time they began screaming, "Trolls will be dealt with! Kate will never win! OTVO! OTVO!, and OTVO baby !"

8. I concluded that those people arrived at the doorstep of building on instructions or request from Mr. DeCastro. I so concluded for a few reasons. First, he had told me he would be serving me with a subpoena, and these people claimed to be serving me with papers. Second, the statement "Kate will never win!" and "OTVO!" are comments Mr. DeCastro has made hallmarks of his YouTube channel. OTVO is an acronym for Overturn Terry vs. Ohio, a court case against which Mr. DeCastro campaigns.

9. Unfortunately, I now understand that my building security system was not recording video due to storage capacity issues. A true and correct copy of the intercom to cell phone call logs are attached here as Exhibit C.

10. Reports of this incident have been taken by local and federal law enforcement and I have relocated myself and my family to a secure location for the immediate future.

11. While I am taking a risk by filing this affidavit, at this point I feel it necessary to bring the truth to light.

Signed under the penalties of perjury on this 23rd day of October 2022.

Todd Lyon
Todd Lyon